

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**TIMOTHY PAGE, TREVOR PAGE,
TICINO CAPITAL LIMITED,
WELLESLEY HOLDINGS LIMITED,
PORRIMA LIMITED, EMERGENT
INVESTMENTS COMPANY, and FJ
INVESTMENTS INTERNATIONAL
INC.,**

Defendants,

JANAN PAGE,

Relief Defendant.

Civil Action No. 21-cv-

DECLARATION OF TREVOR T. DONELAN

I, Trevor T. Donelan, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. Since September 2014, I have been employed as an Enforcement Accountant with the U.S. Securities and Exchange Commission (“the Commission”) in its Boston Regional Office. My duties include conducting investigations relating to potential violations of the federal securities laws.

2. I received a Bachelor of Science degree in business administration, with a concentration in accounting, from the University of Richmond in Virginia in 2000. Before joining the Commission, I was most recently a managing director in the forensic accounting and complex business litigation unit at StoneTurn Group, LLP (“StoneTurn”), in Boston, where I worked for over seven years. Before joining StoneTurn, I held forensic accounting and auditor

positions for a total of approximately seven years with Deloitte Financial Advisory Services LLP, and Arthur Andersen LLP, both in Boston.

3. I am a Certified Public Accountant in the Commonwealth of Massachusetts, and a Certified Fraud Examiner by the Association of Certified Fraud Examiners. I am also certified in Financial Forensics by the American Institute of Certified Public Accountants.

4. I make this Declaration based upon my personal knowledge and upon information and belief as set forth below, and in support of the Commission's Motion for an Order Freezing and Repatriating Assets.

5. In or about 2017, I became actively involved in the Commission's investigation into possible violations of the federal securities laws by the defendants in this matter (the "Defendants").

6. In the course of that investigation, I reviewed documents and data produced to the Commission and attended witness interviews. The purpose of this declaration is to relay certain information that the Commission has gathered about the Defendants through interviews and testimony of certain witnesses and the review and analysis of certain documents.

7. The principal sources of documentation produced to the Commission that I have relied upon for this declaration include, but are not limited to:

- a. Transfer agent records for certain public company issuers under the control of and/or traded by the Defendants.
- b. Trading data collected by the Commission for certain public company issuers held by and/or traded by the Defendants (referred to as "Blue Sheet Data").
- c. Brokerage records for certain of the Defendants' accounts held at domestic and foreign broker-dealers and brokerage records for certain of the foreign brokerage

accounts through which Defendants' shares were traded as described in the Complaint.

- d. Banking records for certain of the Defendants' accounts.
- e. Publicly available information including filings made to the Commission and OTC Markets Group ("OTC Markets"), and public information regarding the market price and trading volume of certain securities.
- f. Information provided by, and/or interviews with, witnesses.

8. I have been asked by counsel for the Commission to summarize certain transactions and communications involving the defendants in this case. To the extent I refer to my "understand[ing]" herein, that understanding is based on my review of the evidence collected in the investigation that led to the filing of this case.

DEFENDANTS

9. Timothy ("Tim") Page, 71, is a citizen of the United Kingdom ("U.K.") and, at various times, resided in the U.K., Switzerland and Fiji.

10. Trevor Page, 35, is a U.K. resident and is Tim Page's son. Trevor Page worked for a United States brokerage firm from August 2011 through January 2012, when his employment was terminated. Based on records I reviewed from the Central Registration Depository maintained by the Financial Industry Regulatory Authority (FINRA), Trevor Page passed FINRA's Series 7 exam. This exam tests basic securities industries topics necessary for securities brokers. Attached here as **Exhibit A** is a report of Trevor Page's regulatory exam history.

11. Ticino Capital Limited is a Maltese corporation formed in June 2014, owned on paper by a Swiss attorney but controlled by the Pages.

12. Wellesley Holdings Limited is a Hungarian corporation formed in May 2018, owned on paper by a Swiss citizen but controlled by the Pages.

13. Porrima Limited is a Hungarian corporation formed in February 2018, owned on paper by a Hungarian lawyer based in Budapest but controlled by the Pages.

14. Emergent Investments Company is a Hungarian corporation formed in February 2018, owned on paper by a citizen of the Philippines but controlled by the Pages.

15. FJ Investments International, Inc. is a Utah corporation formed in early 2018 and controlled by a Utah resident referred to herein and in the Complaint as Person C.

RELIEF DEFENDANT

16. Janan Page, 63, is a resident of the U.K., Switzerland and Fiji. She is the wife of Tim Page.

RELATED PARTIES

17. EnviroTechnologies International Inc. (“EnviroTechnologies”) represents in public filings that it is an organic products company. EnviroTechnologies (Ticker: ETII) trades on the OTC Markets. EnviroTechnologies was incorporated in Delaware in 1996 under the name HIS of Virginia, Inc., and is currently headquartered in Pleasant Grove, Utah.

18. BioHemp International Inc. (“BioHemp”) is a Nevada corporation that purportedly has a principal place of business in New York, New York. BioHemp was originally incorporated in Nevada in August 2012 as Book It Local Inc., later changed its name to Blake Insomnia Therapeutics, Inc. (“Blake”), and then later changed its name to BioHemp International, Inc. In August 2013, Book It Local registered a class of its securities with the Commission under Section 12(g) of the Exchange Act. As a result of that registration, the company had an obligation under Section 15(d) of the Exchange Act to file periodic and other reports with the

Commission. During the time period at issue in this Complaint, BioHemp stock (Ticker: BKIT) was quoted on the OTC Markets. The Commission suspended trading in BioHemp stock for 10 days effective July 26, 2019, and on September 1, 2021, revoked the registration of its shares under the Exchange Act for failure to comply with its reporting obligations.

19. Link Reservations Inc. (“Link”) is a Nevada corporation headquartered in Herefordshire, U.K. Link was originally incorporated in December 2006 as Wishart Enterprises, Ltd. In June 2010, Wishart changed its name to Vendum Batteries, Inc. In May 2015, Vendum Batteries changed its name to Link. Link’s common stock is quoted on OTC Markets under the symbol LRSV.

PUBLIC RECORDS

20. Based on my review of public records, specifically the Commission’s EDGAR system and/or the OTC Markets Group Inc. website:

- a. I did not observe any instance in which the Defendants registered their stock sales that are described in the Complaint.
- b. I did not observe any instance of the Defendants disclosing that the Pages were the beneficial owners of more than five percent of any of EnviroTechnologies, BioHemp, Link or Cyberfort, or that the Pages were part of a group that were collectively beneficial owners of more than five percent of any of EnviroTechnologies, BioHemp, Link or Cyberfort.
- c. Attached hereto as **Exhibit B** are public records concerning the merger and subsequent change of control associated with EnviroTechnologies.
- d. Between August 14, 2013 and September 1, 2021, BioHemp’s stock was registered under Section 12 of the Securities Exchange Act of 1934.

SUMMARY SALE AND TRANSFER INFORMATION

21. The table below is a summary of minimum trading proceeds for various accounts that I understand to be associated with one or more of the Defendants, including stock sold through an offshore platform operated by Steve Bajic and Rajesh Taneja (*see SEC v. Bajic, et al.*, 20-cv-00007 (S.D.N.Y. Jan. 2, 2020)). The Complaint describes the Bajic-Taneja trading platform and some of the entities through which it operated, including Norfolk Heights Ltd., Fountain Drive Ltd. and Tamarind Investments, Inc.

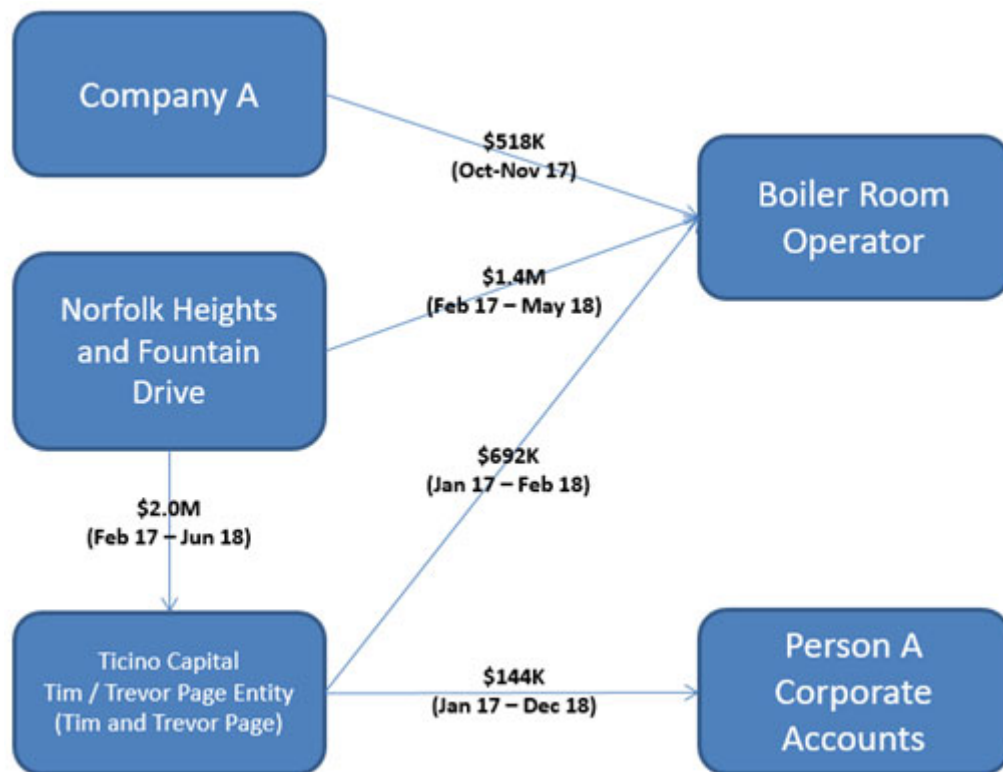
ISSUER	ACCOUNT NAME	PROCEEDS FROM				GRAND TOTAL
		2016	2017	2018	2019	
ENVIROTECHNOLOGIES	FOUNTAIN DRIVE LIMITED		\$ 2,778,559	\$ 793,193		\$ 3,571,752
	NORFOLK HEIGHTS LTD		623,108			623,108
	COMPANY A		377,569	44,798		422,367
	TAMARIND INVESTMENTS INC		(9,362)			(9,362)
ENVIROTECHNOLOGIES TOTAL			3,769,873	837,991		4,607,864
BIOHEMP	WELLESLEY HOLDINGS LTD				1,928,907	1,928,907
	EMERGENT INVESTMENTS COMPANY				937,373	937,373
	PORRIMA LTD				753,239	753,239
BIOHEMP TOTAL					3,619,518	3,619,518
LINK	NORFOLK HEIGHTS LTD	1,721,804	214,203			1,936,008
	FOUNTAIN DRIVE LIMITED	325				325
	COMPANY A		(1,071)			(1,071)
LINK TOTAL		1,722,129	213,133			1,935,262
CYBERFORT	TICINO CAPITAL LTD			1,904,042		1,904,042
	EMERGENT INVESTMENTS COMPANY			5,561		5,561
CYBERFORT TOTAL				1,909,603		1,909,603
GRAND TOTAL		\$ 1,722,129	\$ 3,983,006	\$ 2,747,595	\$ 3,619,518	\$ 12,072,248

22. I am aware that the Pages engaged in additional trading activity but do not have complete records at this time that would permit the quantification of those additional trades.

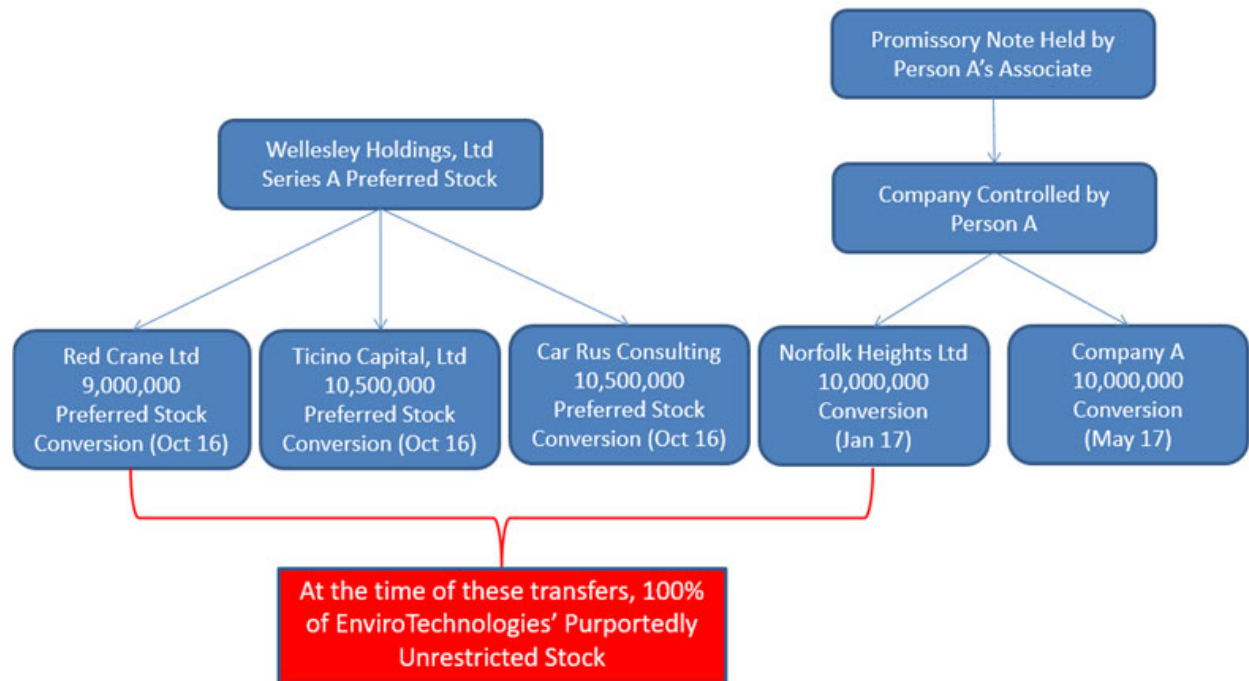
23. The table below reflects transfers of proceeds I understand to be associated with the sale of stock of Link, EnviroTechnologies and/or BioHemp to financial accounts held in the name of Janan Page individually or joint accounts held with Tim Page.

DATE	PROCEEDS OF	PAID TO	AMOUNT
11/10/2016	LINK	TIM AND JANAN PAGE (BANCO DELLO STATO)	\$ 40,000
11/10/2016	LINK	TIM AND JANAN PAGE (BARCLAYS)	50,000
11/16/2016	LINK	TIM AND JANAN PAGE (BARCLAYS)	50,000
11/23/2016	LINK	TIM AND JANAN PAGE (BANCO DELLO STATO)	60,000
11/24/2016	LINK	TIM AND JANAN PAGE (BANCO DELLO STATO)	50,000
11/25/2016	LINK	TIM AND JANAN PAGE (BARCLAYS)	50,000
12/21/2016	LINK	TIM AND JANAN PAGE (BANCO DELLO STATO)	200,000
2/16/2017	LINK	TIM AND JANAN PAGE (BARCLAYS)	70,000
3/13/2017	ENVIROTECHNOLOGIES	TIM AND JANAN PAGE (BARCLAYS)	60,000
4/3/2017	ENVIROTECHNOLOGIES	TIM AND JANAN PAGE (BARCLAYS)	85,000
5/22/2019	BIOHEMP	JANAN PAGE (JP MORGAN CHASE)	20,000
7/4/2019	BIOHEMP	TIM AND JANAN PAGE (BARCLAYS)	150,000
9/9/2019	BIOHEMP	TIM AND JANAN PAGE (BARCLAYS)	200,000
TOTAL			\$ 1,085,000

24. As the table below reflects, stock sale proceeds associated with certain Defendants' sales of EnviroTechnologies stock were distributed to Ticino and at least one other entity that I understand to be associated with the Pages. Individuals identified in the Complaint as Person A and the Boiler Room Operator also received some of those proceeds.

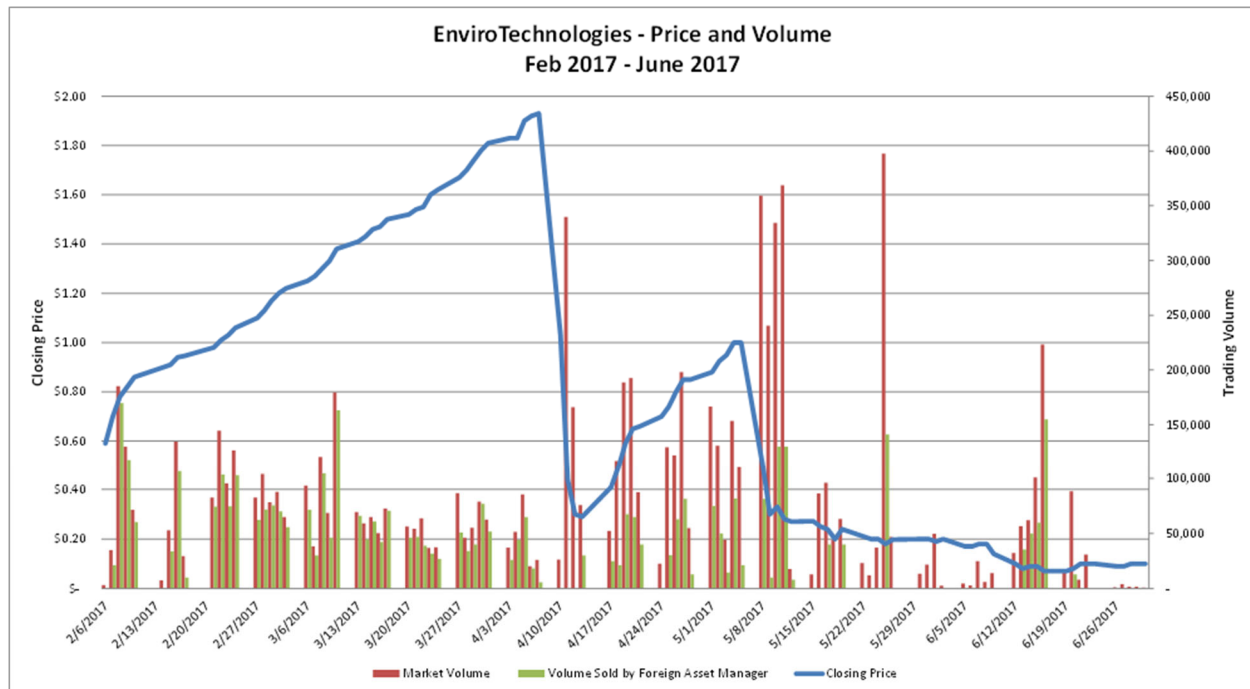


25. The table below illustrates the EnviroTechnologies stock transfers to Red Crane Ltd., Car Rus Consulting, Norfolk Heights Ltd., and Company A.



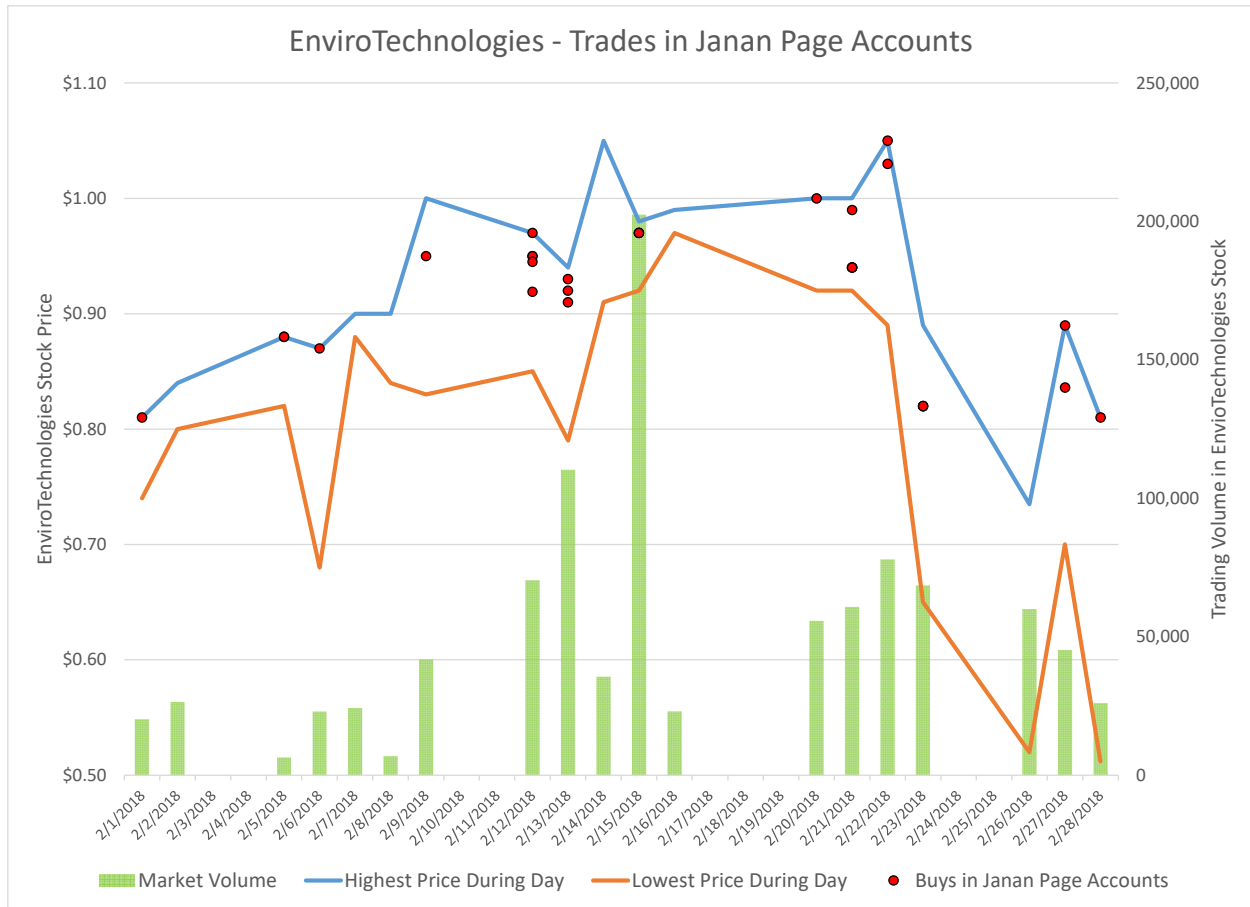
STOCK PROMOTIONS AND RELATED TRADING ACTIVITY

26. On 46 of the 101 available trading days between February 7, 2017 and June 16, 2017, the Defendants' stock sales accounted for more than 50% of the total market volume for EnviroTechnologies and they sold approximately 3.9 million shares. As the chart below reflects, between February and June 2017, this trading coincided with an increase in the price of the stock from \$0.60 per share to a high of \$1.93 per share on April 7, 2017, at which point the notional market capitalization of EnviroTechnologies was at least \$390 million.



27. I have reviewed conversations surreptitiously recorded between a witness who was cooperating with an FBI investigation and Tim Page. During such a call on or about February 13, 2018, Tim Page complained that he was not able to sell as much stock as he wanted to because of the low volume. Tim Page further explained: “we are maintaining the price, and it’s costing us money, and it’s very frustrating because I can’t capture . . . so it’s costing me money just trying to maintain that so I’m getting very frustrated.”

28. Based on my review of trading records, an account in the name of Janan Page entered a series of buy orders in the stock of EnviroTechnologies. The chart below illustrates this trading:



ENVIROTECHNOLOGIES

29. According to records I reviewed, between approximately March 2017 and May 2019, Ticino and Emergent sent over \$160,000 to the corporate bank account of a company controlled by the individual identified in the Complaint as Person C. Person C then transferred nearly \$80,000 of that money to EnviroTechnologies. Tim Page and Person C arranged promissory notes concerning one or more of these transfers.

30. As part of my investigation into these facts, I participated in interviews of several witnesses. One of those witnesses reported that, in connection with the merger that created EnviroTechnologies, the Pages, Person A and Person C discussed that the Pages would benefit by controlling EnviroTechnologies' unrestricted stock and selling it.

31. According to records I reviewed, including email correspondence, Trevor Page arranged for EnviroTechnologies' counsel to write opinion letters that would authorize certain common stock to be issued to Car Rus Consulting, Red Crane, Ltd., Ticino, Norfolk Heights and Company A by EnviroTechnologies' transfer agent without a restricted legend. Attached hereto as **Exhibit C** are those opinion letters. The Commission has sued that lawyer for, among other things, issuing these opinion letters. *See SEC v. Bauman*, 21-cv-1651-GMN-EJY (D. Nev. Sept. 8, 2021).

32. During approximately February through April 2017 and again from February through May 2018, my understanding is that the Pages hired a boiler room operator, Garrett O'Rourke, and his team to call investors to encourage them to buy the EnviroTechnologies stock that the Pages planned to sell. *See SEC v. O'Rourke*, 19-cv-4137 (KAM) (E.D.N.Y.). In the *O'Rourke* case, the Commission alleged that O'Rourke "failed to disclose the material information that while he was encouraging...investors to buy EnviroTechnologies stock, he was working in a coordinated efforts [with others] to dump large quantities of that stock into the demand he was working to create." O'Rourke subsequently settled the Commission's charges. Between about February and April 2017, the Pages arranged for O'Rourke to be paid at least \$1.1 million from sales proceeds of EnviroTechnologies stock as compensation for his promotional activities.

33. As of June 30, 2017, EnviroTechnologies had 233,277,260 outstanding shares of stock. From February 7, 2017, through May 5, 2017, shareholders that I believe were selling stock on behalf of the Pages sold 2,975,522 shares of EnviroTechnologies stock, which exceeds one percent of the outstanding shares.

34. As of June 30, 2018, EnviroTechnologies had 30,162,042 outstanding shares of

stock. From February 9, 2018, through May 10, 2018, shareholders that I believe were selling stock on behalf of the Pages sold 898,715 shares of EnviroTechnologies stock, which exceeds one percent of the outstanding shares.

BIOHEMP

35. The individual identified in the Complaint as Person C incorporated defendant FJ Investments in early 2018, and, on paper, purchased 18,000,000 restricted shares of BioHemp stock—the majority of the company’s outstanding shares—through FJ Investments. FJ Investments received the shares without FJ Investments or anyone else providing consideration for those shares.

36. As part of the Commission’s investigation into this matter, Person C testified to the Commission staff under oath (the “Testimony”). During that Testimony, Person C stated that he held the 18,000,000 restricted shares through FJ Investments on Tim Page’s behalf.

37. Person C hired the individual identified in the Complaint as Person D as BioHemp’s Chief Executive Officer. He did so at the direction of, or in coordination with, the Pages.

38. In October 2018, BioHemp executed a reverse split of BioHemp’s stock that replaced every 1,000 outstanding shares for 1 share, the result of which reduced the amount of unrestricted stock that was available for trading in public markets to about 11,000 shares.

39. In March 2019, BioHemp issued 25,000,000 shares to FJ Investments. FJ Investments then held approximately 99.99% of BioHemp’s outstanding stock.

40. Between May 2019 and July 2019, Defendants Wellesley, Porrima, and Emergent obtained 3,818,813 shares of BioHemp stock. These shares were not marked as restricted. Consequently, these Defendants collectively held approximately 99.7% of the BioHemp

unrestricted shares available for trading in the public markets. According to documents I reviewed, these Defendants obtained these shares by purchasing an interest in a promissory note, attached hereto as **Exhibit D**, previously issued by BioHemp. As reflected in **Exhibit E**, attached hereto, BioHemp issued shares to these Defendants in lieu of paying the promissory note.

41. I reviewed emails indicating that Trevor Page arranged for the same attorney he used for the EnviroTechnologies transaction to issue opinion letters attesting that BioHemp's transfer agent could issue BioHemp shares to Wellesley, Porrima, and Emergent without restrictive legends. Attached hereto as **Exhibit F** are those opinion letters.

42. Thereafter, Wellesley, Porrima, and Emergent, directly or indirectly, deposited into brokerage accounts and sold over three million BioHemp shares to investors, generating over \$3.4 million in proceeds. These stock sales over a three-month period comprised more than one percent of BioHemp's outstanding shares. Specifically, BioHemp had 28,850,700 outstanding shares as of July 8, 2019, one percent of which is 288,507 shares. The tables below reflects that these Defendants sold in excess of 288,507 shares:

QUANTITY OF BIOHEMP STOCK SOLD				
MONTH	EMERGENT INVESTMENTS COMPANY	PORRIMA LTD	WELLESLEY HOLDINGS LTD	TOTAL
May-19	337,329			337,329
Jun-19	426,744		919,388	1,346,132
Jul-19	7,500	1,127,137	307,885	1,442,522
TOTAL	771,573	1,127,137	1,227,273	3,125,983

PROCEEDS OF BIOHEMP STOCK SOLD				
MONTH	EMERGENT INVESTMENTS COMPANY	PORRIMA LTD	WELLESLEY HOLDINGS LTD	TOTAL
May-19	\$ 391,555			\$ 391,555
Jun-19	\$ 531,777		\$ 1,364,174	\$ 1,895,952
Jul-19	\$ 14,040	\$ 753,239	\$ 564,733	\$ 1,332,011
TOTAL	\$ 937,373	\$ 753,239	\$ 1,928,907	\$ 3,619,518

43. My understanding is that Tim Page hired and paid a boiler room operator, Garrett

O'Rourke, and his team to call investors and tout BioHemp at or around the time Wellesley, Porrima and Emergent directly or indirectly sold BioHemp shares. The Pages arranged to compensate the boiler room operator over \$384,000 for his boiler room's services as detailed in the following table.

Date	Paid From	Paid To	Amount
6/3/2019	Emergent Investments Company	O'Rourke Corporate Entity	\$1,000
6/13/2019	Emergent Investments Company	O'Rourke Corporate Entity	\$121,644
6/27/2019	Emergent Investments Company	New York Jeweler on Behalf of O'Rourke for Watch	\$262,000
TOTAL			\$384,644

COORDINATED TRADES

44. I have reviewed conversations surreptitiously recorded between a witness who was cooperating with an FBI investigation (the "Cooperating Witness") and Tim and Trevor Page. During such a conversation on or about February 13, 2018, Tim Page and the Cooperating Witness discussed that they would arrange for the Cooperating Witness to use a network of brokers to buy Link stock on behalf of brokerage customers in exchange for a 20 to 25% kickback. They also discussed how Tim Page controlled 108 million out of 110 million of Link's purportedly unrestricted shares.

45. On or about February 15, 2018, during another surreptitiously recorded call between the Cooperating Witness and Tim Page and Trevor Page, Tim Page explained that Trevor Page would coordinate their trading with a Swiss-based broker.

46. On or about February 15 and February 16, 2018, Tim Page and Trevor Page coordinated cross trades (*i.e.*, the placement of buy and sell orders at or about the same time, for at or about the same price, and at or about the same quantity) with the Cooperating Witness.

47. On or about February 23, 2018, during a surreptitiously recorded call between the Cooperating Witness and Tim Page, Tim Page reminisced about having engaged in the

coordinated cross trades on February 15 and 16, 2018 and explained that he intended to pay the kickback from his personal account.

48. On or about February 27, 2018 and March 1, 2018, Tim and Trevor Page coordinated additional cross trades with the Cooperating Witness.

49. During the February 23, 2018 recorded conversation, Tim Page explained that he and Trevor Page had been placing trades to support the price of Link at \$0.11 per share until the Cooperating Witness could arrange more purchases.

VENUE

50. Based on my review of Blue Sheet data, brokerage account holders living in the Eastern District of New York purchased EnviroTechnologies and/or BioHemp stock during the period of time subject to the Complaint.

ACCOUNTS

51. The table below is a summary of financial institution accounts of which I am aware that I believe are associated with, or held for the benefit of, one or more of the Defendants and Relief Defendant.

Institution	Location	Possible Acct Name(s)	Possible Acct No(s) (last 4 digits)
JP Morgan Chase, N.A.	United States	Janan Page	3881
		Sweet Pea Capital LLC	0629
Wells Fargo Bank, N.A.	United States	Testre LP	2764
TD Ameritrade, Inc.	United States	Janan Page	7119
Barclays Bank PLC	United Kingdom	Timothy and Janan Page	4400
		Timothy Page	8939
HSBC Bank PLC	United Kingdom	Timothy and Janan Page	1950
		Janan Page	2145
Coutts and Co.	United Kingdom	Timothy Page	1909
Banca Dello Stato del Cantone Ticino	Switzerland	Timothy and Janan Page	000U
Valor Capital	Cayman Islands	Emergent Investments Company	9003
		Porrina Ltd	9041
		Wellesley Holdings Ltd	9019
Westpac Banking Corporation	Fiji	Timothy Page	4770

Institution	Location	Possible Acct Name(s)	Possible Acct No(s) (last 4 digits)
MKB Bank	Hungary	Emergent Investments Company	0013 USD 0016 EUR 0013 HUF
		Porrina Ltd	0012 USD
		Prescott Partners	0017 USD 0018 GBP 0010 EUR 0017 HUF
		Wellesley Holdings Ltd	0016 USD
		Timothy Page	0015 USD
Industrial and Commercial Bank of China	Macau	Ticino Capital Ltd	8213 8000
Tendall Capital Markets Ltd	Malta	Ticino Capital Ltd	2001
Bank of Valletta PLC	Malta	Wellesley Consultancy Ltd	1053
		Ticino Capital Ltd	8686
		Car Rus Consulting Ltd	6382
Peter Pesic & Co. Securities, Inc.	Mauritius	Emergent Investments Company	57EI

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 23, 2021, in Boston, Massachusetts.



Trevor T. Donelan